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18 BESTWALL LLC

19 UNITED STATES DISTRICT COURT
20 EASTERN DISTRICT OF CALIFORNIA
21 SACRAMENTO DIVISION

22 **IN RE BESTWALL LLC**

Case No. 2:22-MC-00220-KJM-DB

Subpoena issued in Case No. 3:17-BK-
31795-LTB (Bankruptcy Court, Western
District of North Carolina)

**BESTWALL LLC'S NOTICE OF
REQUEST TO SEAL DOCUMENTS**

Date:
Time:
Dept:
Judge

TO THE COURT AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that on July 11, 2022, as required by Rule 45(e)(2)(B) of the Federal Rules of Civil Procedure, Bestwall LLC (“Bestwall”) filed a request to provisionally seal the following document until the Court determines *Bestwall’s Motion to Determine Invalidity of Clawback Claims by Dana Loomis, PhD and to Compel Compliance with Rule 45 Subpoena* (the Motion). The document requested to be provisionally sealed is Exhibit A to the Request to Seal Documents.

Bestwall also requests that two other documents filed in support of the Motion be sealed. Those documents are Exhibit B to the Request to Seal Documents (an unredacted memorandum of points and authorities in support of the Motion (the “Memorandum”)) and Exhibit 1 to the Declaration of Erin Therrian in Support of the Request to Seal Documents.

Bestwall further requests that it be permitted to file on the public docket a redacted memorandum in support of the Motion. The redacted Memorandum is attached as Exhibit C to the Request to Seal Documents.

Bestwall’s Request to Seal Documents, proposed order, Exhibits A, B, and C to the Request to Seal Documents, the declaration, and Exhibit 1 to the declaration were submitted electronically to the Court by email, and will be personally served on Dr. Loomis.

For the reasons set forth in the accompanying Request to Seal Documents, and for good cause shown, Bestwall respectfully requests that the Court seal the above-referenced documents and allow Bestwall to file the redacted version of the Memorandum.

DATED: July 12, 2022

Respectfully submitted,

KING & SPALDING LLP
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/s/ McGregor W. Scott
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